



February 12, 2025

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**VIA SDNY ECF**

Hon. Philip M. Halpern  
United States District Court, Southern District of New York  
300 Quarropas Street, Courtroom 520  
White Plains, New York 10601

**Re: *JCCA v. Carl Fulgenzi and the Town of Mount Pleasant*  
SDNY Civ. Case No.: 24-cv-02580 (PMH) (VR)**

Dear Judge Halpern:

This firm represents Defendants Carl Fulgenzi as Supervisor and Chief Executive Officer of the Town of Mount Pleasant (“Supervisor Fulgenzi”) and the Town of Mount Pleasant (the “Town”) (collectively, “Defendants”), in the above-referenced action. We write pursuant to Rule 1(C) of the Court’s Individual Practices to respectfully request an adjournment of the pre-motion conference currently scheduled for February 19, 2025 as I will be out of the office on a pre-planned family vacation next week.

This is Defendants’ first request for an adjournment of the pre-motion conference and Plaintiff’s counsel has consented to the requested adjournment. We have conferred with Plaintiff’s counsel, and we are both available the following week on February 27 and 28 (Plaintiff’s counsel has informed us they are unavailable February 24-26).

Thank you very much for the Court’s time and consideration of this request.

RESPECTFULLY SUBMITTED,

**HARRIS BEACH MURTHA CULLINA PLLC**

/s/ *Darius P. Chafizadeh*

DARIUS P. CHAFIZADEH

Application granted. The February 19 pre-motion conference is adjourned to March 5, 2025 at 9:30 a.m.

The Clerk of the Court is respectfully directed to terminate the letter sequence pending at Doc 31.

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
February 12, 2025